

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Klouda Estate Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #3
Start of Soil Removal Activities -Time Critical
Klouda Estate Site
B4Q8
Fort Valley, GA
Latitude: 32.5586000 Longitude: -83.8410000

To: Matt Taylor, USEPA R4 ERRB, Removal Operations Section Chief

From: Benjamin Franco, OSC
Brian Englert, OSC

Date: 10/24/2012

Reporting Period: 10/15/2012 to 10/26/2012

1. Introduction

1.1 Background

Site Number:	B4Q8RV00	Contract Number:	EP-S4-07-04
D.O. Number:	147	Action Memo Date:	5/4/2012
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	5/4/2012	Start Date:	5/4/2012
Demob Date:		Completion Date:	
CERCLIS ID:	GAN000410823	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

1.1.2 Site Description

It is believed that pesticide formulation mixing, application tank washing and application tank dumping occurred as part of a crop dusting operation at the Site. The Site was listed on the Georgia Hazardous Site Inventory on November 10, 2005 in response to a release notification submitted to Georgia Environmental Protection Division (GAEPD) by the Site Estate. Since 2005 the Estate has installed monitoring wells and conducted several sampling events including soil sampling in 2005 and groundwater sampling in 2011. In January 2012 the Georgia Environmental Protection Division (GEPD) conducted sampling and analysis of wells used as the primary source of drinking water for several nearby residences.

Soil sampling results collected in 2005 indicate that toxaphene concentrations in top soil are as high as 31 times the U.S. Environmental Protection Agency's (EPA's) removal action level (RAL) for industrial soil (5321 mg/Kg) and soil contamination above the RAL extends as far as 8 feet beneath the top soil. 2011 results from monitoring well samples located within 300 feet of residential drinking water wells are 7 times the toxaphene RAL for tap water.

Residential well samples collected in 2012 by GAEPD exceeded the maximum contaminant level (MCL) for Lindane in two drinking water wells and was detected in two others; however, the results were below EPA's residents' tapwater action levels. These wells serve as the primary drinking water source for one residence on Fullwood Road. The home owners supplied themselves with bottled water at the states recommendation.

On January 30, 2012, GA EPD referred the site to the U.S. EPA for consideration of a time-critical removal action or other response action as appropriate. On March 1, 2012 EPA mobilized to conduct an initial site reconnaissance and to begin a removal site evaluation (RSE) of the Site. The initial site visit revealed drums containing investigation derived wastes (IDW) near the site monitoring wells as well as several additional open wells on the property. Soil boring locations from the 2005 sampling event were still clearly marked. Subsequent to this visit EPA contacted the Site owner as well as the owners to adjacent residential properties and obtained access to the properties.

1.1.2.1 Location

The Site is located on a 114-parcel of land east in Peach County GA. The southeast corner of the property

adjoins to the intersection of GA State Highway 96 and Fullwood Road. The Site has been historically used for agricultural purposes and is currently used for commercial peach production. The approximate latitude and longitude of the site entrance are 32.5586°N and 83.8410°W.

1.1.2.2 Description of Threat

See Emergency Response Action Memo or POLREP #1.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA has sampled residential wells and soils and instructed affected residents not to consume well water. Because of high levels of toxaphene in drinking water wells, EPA initiated emergency actions on May 4th, 2012 and provided bottled water to affected residents. Also, EPA worked closely with the Ft. Valley Utility Commission to connect these affected residences to city water. On September 24th, 2012, EPA began connecting impacted residences to municipal water supply. As part of this process, 980-1000 ft of 6 inch PVC water main were installed northbound along Fullwood Road and tied in via a reducer and 6 inch valve to a 12 inch main at GA-96. At the end of this line 3-way Fire Hydrant with 2 x 3 inch connection points and 1 x 6 inch connection point was installed. All affected residences were connected to city water by October 12th, 2012.

2.1.2 Response Actions to Date

The following response actions were conducted during this reporting period:

During the week of October 15th, 2012, EPA Emergency and Rapid Response Contractor (ERRS) mobilized personnel and equipment in preparation of soil removal activities.

Tasks performed during that week:

- Set up of office trailer and electrical service
- Installation of temporary fencing surrounding excavation area
- Close out of 3 monitoring wells and a hand dug well in the contamination zone.
- Mobilized excavator, skid steer, loader, equipment trailer, and water truck.

During the week of October 22nd, 2012, ERRS started excavation operations and performed the following tasks:

- Excavated approximately 50% of the contaminated area and stockpiled it for disposal.
- A water truck is being used to provide dust suppression in the excavation area and on stockpiles.
- ERRS is conducting perimeter and personnel air sampling and samples are being sent to a lab for analysis.
- A waste sample of the first 500 cubic yds of stockpiled contaminated material had a result of .37 mg/L for toxaphene and was it was under the .5 mg/L hazardous waste limit of the toxicity characteristic leaching procedure (TCLP) test for toxaphene. The contaminated material will be sent to Taylor County Subtitle D Landfill in Mauk, GA. This landfill is an approved CERCLA Subtitle D landfill according to the Off-Site Disposal Rule.
- ERRS transported and disposed stockpile #1. A total of 17 trucks transported an approximate total 330 tons of toxaphene contaminated non-hazardous soil.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Enforcement activities continue with the identification and Noticing of PRPs.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Toxaphene Non-Hazardous	Soil	330 tons		None	Taylor County Subtitle D Landfill Mauk, GA

2.2 Planning Section

2.2.1 Anticipated Activities

EPA anticipates the following activities will be completed by the end of the next reporting period:

- Continue with soil excavation operations.
- Continue staging contaminated soil in stockpile.
- Confirmation sampling by START of excavated areas.
- Transportation and disposal of stockpiled contaminated soil.

2.2.1.1 Planned Response Activities

EPA is in the process of planning for the following activities:

- Site restoration

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$595,000.00	\$58,932.00	\$536,068.00	90.10%
TAT/START	\$92,456.00	\$49,750.00	\$42,706.00	46.19%
Intramural Costs				
Total Site Costs	\$687,456.00	\$108,682.00	\$578,774.00	84.19%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

4. Personnel On Site

EPA: 2 OSCs

ERRS: 4 (1Project Manager, 2 Operators, 1 Truck Driver/Laborer)

5. Definition of Terms

No information available at this time.

6. Additional sources of information

No information available at this time.

7. Situational Reference Materials

No information available at this time.